

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 22-33553 (CML)</b>
<b>Alexander E. Jones,</b>	§	
	§	<b>Chapter 11</b>
<b>Debtor.</b>	§	
	§	

**STATEMENT OF THE TEXAS FAMILIES  
IN SUPPORT OF CONVERSION OF JONES’S CHAPTER 11  
CASE TO A CASE UNDER CHAPTER 7 OF THE BANKRUPTCY CODE**

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The Texas Families,<sup>1</sup> as creditors and parties in interest in the above-captioned case (the “Jones Case”) proceeding under chapter 11 of the Bankruptcy Code, respectfully submit this statement (the “Statement”) in support of conversion of the Jones Case, as requested by the *Debtor’s Emergency Motion for Entry of an Order Converting Debtor’s Chapter 11 Case to a Case Under Chapter 7 of the Bankruptcy Code* (the “Motion”). Upon the Court’s consideration of the Motion, the Texas Families hereby request that any order approving the Motion be substantially in the form of the order attached as Exhibit A to the *Notice of Filing of Supporting Parties’ Conversion Order* [ECF No. 698] (the “Proposed Order”), rather than the form attached to the Motion, as the Proposed Order provides additional protections for the benefit of the estate and its creditors.

**BACKGROUND**

1. On June 5, 2024, the Debtor filed his Motion [ECF No. 684], seeking conversion of this case to Chapter 7.
2. The Texas Families have reviewed and approved the Proposed Order.

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<sup>1</sup> The “Texas Families” are Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and the Estate of Marcel Fontaine.

**STATEMENT**

3. While the Texas Families firmly believe conversion is warranted and is in the best interests of Jones's estate and all creditors, by supporting the Proposed Order, the Texas Families request the inclusion of certain provisions that would ensure an efficient and orderly wind down of Jones's estate in a manner that ensures the preservation of valuable estate assets and maximizes creditor recoveries because, in comparison with the proposed order filed by the Debtor in conjunction with his Motion, the Proposed Order provides additional protections designed to (i) ensure the prompt election of a chapter 7 trustee to safeguard assets for the benefit of the estate; (ii) facilitate a chapter 7 trustee's ability to pursue estate claims and causes of action efficiently and effectively; and (iii) clarify that certain assets constitute property of the estate.

**NOTICE**

4. Notice of this Statement will be served via ECF.

**RESERVATION OF RIGHTS**

5. For the avoidance of doubt, the Texas Families reserve their rights to amend or supplement this Statement on any basis and reserve all rights and remedies with respect to the Motion and otherwise in the Jones Case.

**CONCLUSION**

WHEREFORE, the Texas Families requests that this Court enter the Proposed Order converting the Jones Case to a case under chapter 7 and granting such other relief as may be appropriate under the circumstances.

Dated: June 12, 2024

Respectfully Submitted,

*/s/ Jarrod Martin*

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***Co-Counsel to the Texas Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Statement has been served on Jones's counsel, Jones, and all parties receiving or entitled to notice through CM/ECF on this 12th day of June, 2024.

/s/ Jarrod Martin

Jarrod Martin